

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

JOSEPH P. SHAINÉ,

Debtor

CHAPTER 13

CASE NO. 23-40650-EDK

BARBARA SENNETT,

HANS WAGNER, AND

J. DOE, *a minor child*,

Plaintiffs

v.

JOSEPH P. SHAINÉ,

Defendant

ADV. PROCEEDING NO. 23-04030-EDK

**MOTION TO EXTEND THE DEADLINE TO COMPLY
WITH PRE-TRIAL SCHEDULING ORDER**

To the Honorable Elizabeth D. Katz, U.S. Bankruptcy Judge:

Now come the Plaintiffs, Barbara Sennett, Hans Wagner, and J. Doe,¹ and respectfully move this Honorable Court to grant this Motion to Extend all deadlines in the Court's Scheduling and Pre-Trial Order. The Parties request an extension of approximately one week, or any other time as the Court may deem appropriate.

As reasons therefore, as previously reported, the Parties were previously in settlement negotiations. However, those negotiations have since broken down and the parties have elected to continue with the litigation. The Parties therefore request this extension so that the Court's

¹ J. Doe is a pseudonym. J. Doe is a minor child whose name is therefore redacted pursuant to Fed. R. Bankr. P. 9037.

Elizabeth D. Katz